



April 9, 2012

VIA ELECTRONIC FILING AND REGULAR MAIL

Honorable Michael A. Shipp
Magistrate Judge
U.S. District Court, District of New Jersey
M.L. King Jr. Federal Bldg & Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Charlene Dzielak and Shelley Baker v. Whirlpool Corporation, Lowe's
Companies, Inc. and Sears Holdings Corporation
Civil Action No. 2:12-cv-00089-SRC-MAS

David R. Kott
Partner
T. 973.639.2056
F. 973.624.7070
dkott@mccarter.com

Dear Judge Shipp:

We represent the defendants Whirlpool Corporation, Lowe's Companies, Inc. and Sears Holdings Corporation in this case. In support of our application for the pro hac vice admission of Joel S. Neckers, Esq., we enclose the following:

1. Certification of David R. Kott in Support of Application for Admission of Joel S. Neckers, Esq. pro hac vice;
2. Certification of Joel S. Neckers, Esq., in Support of Application for Admission pro hac vice;
3. Proposed Order admitting Joel S. Neckers., pro hac vice.

As noted in my enclosed Certification, we have been informed by Scott A. Bursor, Esq., lead counsel for the plaintiffs, that the plaintiffs do not object to the pro hac vice admissions of Mr. Neckers. Accordingly, if the enclosed Order meets with Your Honor's approval, I would request that Your Honor enter the Order and that Your Honor's Deputy Clerk electronically file it.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to be "DK", written over a horizontal line.

David R. Kott

DRK/dak
Enclosures

cc: James E. Cecchi, Esq. (w/encs. - via electronic filing and regular mail)

BOSTON

HARTFORD

NEW YORK

NEWARK

PHILADELPHIA

STAMFORD

WILMINGTON